

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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February 27, 2023

BY ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Haji Najibullah (aka Nesar Ahmed Mohammed)
(S2) 14 Cr. 401 (KPF)

Dear Judge Failla,

We write seeking the Court's endorsement of the attached proposed order directing MDC Brooklyn to provide Nesar Ahmed Mohammed (Register Number 76469-054) with urgent medical attention from a licensed physician.

On February 13, 2023, the Court held a telephone conference in this case. At the end of that conference, the defense indicated that Mr. Mohammed had a mass on his right leg that required medical attention, and that it would seek the Court's assistance if necessary. On February 24, 2023, the defense visited Mr. Mohammed at MDC Brooklyn and observed a large and pronounced mass below Mr. Mohammed's right knee. As a result of the mass, Mr. Mohammed experiences significant pain performing routine tasks, like climbing his bunk bed and navigating stairs. Further, Mr. Mohammed's efforts to obtain medical attention from MDC Brooklyn's medical staff have been in vain.

The defense is concerned that the mass is indicative of a potentially life-threatening deep vein thrombosis and respectfully requests that the Court endorse the attached order and direct MDC Brooklyn to take Mr. Mohammed to a hospital for an evaluation by a licensed medical doctor.

Respectfully Submitted,



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Mark B. Gombiner, Esq.

Samuel Jacobson, Esq.

Ariel C. Werner, Esq.

Cc: Government Counsel